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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA *ex rel.*
PEGGY THORNTON, Realtor,

and

PEGGY THORNTON,

Plaintiff,

vs.

PORTOLA DEL SOL OPERATOR, LLC, a
foreign limited-liability company; TMIF II
PORTOLA, LLC, a foreign limited-liability
company; APARTMENT MANAGEMENT
CONSULTANTS, LLC, a foreign limited
liability company; and RENE
RICHARDSON, as AGENT of PORTOLA
DEL SOL OPERATOR, LLC,

Defendants.

Case No. 2:21-cv-01123-APG-BNW

**JOINT MOTION AND PROPOSED
ORDER TO EXTEND DEADLINE TO
FILE RESPONSE TO COMPLAINT**

(First Request)

1 Plaintiff Peggy Thornton (“Plaintiff”) and Defendant Apartment Management Consultants,
2 LLC (“Defendant” or “AMC”) (collectively, the “Parties”), by and through their undersigned
3 counsel, for good cause shown, hereby jointly move and agree to extend AMC’s deadline to file its
4 response to Plaintiff’s Complaint [ECF No. 1] from January 18, 2023, to February 21, 2023 for the
5 following reasons:

6 1. Plaintiff filed the Complaint on June 14, 2021 [ECF No. 1].
7 2. AMC’s response to the Complaint was originally due on January 18, 2023.
8 3. The Parties informally agreed to extend the deadline to respond to February 1, 2023.
9 4. Undersigned counsel, Snell & Wilmer L.L.P. was retained to represent AMC on or
10 about January 26, 2023.

11 5. The Parties jointly move and agree to extend the deadline for AMC to respond to
12 the Complaint to and including February 21, 2023.

13 6. This extension request is supported by good cause. Specifically, as AMC’s counsel
14 was just retained, they require sufficient time to evaluate and investigate the allegations in the
15 Complaint. Additionally, AMC’s lead counsel has a trial beginning on February 8, 2023, which
16 will require substantial time.

17 7. This extension request is sought in good faith and is not made for the purpose of
18 delay.

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CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **JOINT MOTION AND PROPOSED ORDER TO EXTEND DEADLINE TO FILE RESPONSE TO COMPLAINT** by method indicated below:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

DATED February 6, 2023

/s/ Maricris Williams
An employee of SNELL & WILMER L.L.P.

4870-8024-7118